

Message

From: Strauss, Linda [Strauss.Linda@epa.gov]
Sent: 3/7/2018 8:45:46 PM
To: Keigwin, Richard [Keigwin.Richard@epa.gov]; Beck, Nancy [Beck.Nancy@epa.gov]; Bertrand, Charlotte [Bertrand.Charlotte@epa.gov]
Subject: awareness only -- Project on Gov't Oversight - Awaiting DDL Info - Request for info on WPS/CPA

Due tomorrow.

From: Daguillard, Robert
Sent: Wednesday, March 07, 2018 3:14 PM
To: Han, Kaythi <Han.Kaythi@epa.gov>; Strauss, Linda <Strauss.Linda@epa.gov>; Dunton, Cheryl <Dunton.Cheryl@epa.gov>; Sisco, Debby <Sisco.Debby@epa.gov>
Subject: LINDA/OPP: Project on Gov't Oversight - Awaiting DDL Info - Request for info on WPS/CPA

OUTLET	POGO
REPORTER	LAURA PETERSON
DDL	Awaiting Info

Linda and team, what's a reasonable ETA? No info yet from the reporter.

Cheers, R.

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Hi Robert, I'm closing in on my deadline so wanted to retry getting a quote from you. Again, I'm writing a piece on the EPA's delay of certain Worker Protection Standards and Certification of Pesticide Applicators revisions.

Here are my specific questions:

1) The December notice published in the Federal Register by the agency says that "by the end of FY 2018, EPA expects to publish a Notice of Proposed Rulemaking to solicit public input on proposed revisions to the WPS requirements for minimum ages, designated representatives, and application exclusion zones." However, the WPS home page says the three requirements that went into effect in January 2018 regarded pesticide safety training, new posters and suspension of application if people are in the "application exclusion zone." What is the difference between the AEZ provision in effect now and the one that will be considered in the new proposed rulemaking?

2) The EPA [web page on the CPA](#) states that:

"EPA has been engaging stakeholders both formally and informally on ideas for the revisions since the 1990s. EPA has received extensive feedback, including in-depth comments on the proposed revisions. The revisions were developed with input from individuals, state and tribal regulatory partners and other organizations through numerous stakeholder meetings and other outreach."

Given this substantial investment in the rule revisions, can you tell me who or what parties influenced Administrator Pruitt's decision to revisit elements of the changes?

3) Farmworker advocates point to EPA's own findings of up to 3,000 preventable incidents of pesticide exposure per year as evidence of the harm to workers these delays will pose. Does EPA dispute these findings, or does it believe the delays will not result in unnecessary exposure incidents?

Thanks for your prompt response. I'm working on a deadline of COB tomorrow (Thursday), but would like to get your comments sooner if possible.

Cheers, R.

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